

**Unimatic Manufacturing Corporation** has submitted a risk-based disposal application for a site in Fairfield, New Jersey. There is widespread contamination throughout the site with levels over 2000 ppm in the soils up to 20 feet deep. The groundwater has tested positive for PCBs with levels up to 260 ppb. There is also a building on site that currently is being occupied and used by the new owners as a manufacturing facility for assembling picture frames. The previous owners (Unimatic) conducted die casting operations at the facility which resulted in PCB contaminated ceilings, walls and floors (both concrete and metal) throughout the building. Indoor air samples taken on 03/03/2005 show levels ranging between  $1.7 \mu\text{g}/\text{m}^3$  –  $6.1 \mu\text{g}/\text{m}^3$  PCBs in the tubes (no results in filters).

There are four areas of major concern that we have with their proposals:

- They want to establish a CEA for the groundwater and provide no treatment or monitoring,
- they want to cap the site without excavating and removing any soils for off-site disposal,
- they propose an alternate decontamination method to clean the interior metal surfaces but do not have any test data and have not submitted an application for alternate decontamination, and
- they have proposed to use §761.30 (p) to clean the interior of the building, which does not require any confirmatory sampling or monitoring.

Communications with the previous owners have been through their legal counsel, who is a former EPA Region 2 attorney.

10/28/11 - I sent the following in an email to Chris Geller:

*Bill Friedman called yesterday and will be sending EPA a letter regarding the PCB contamination within the building at the site and their proposal for addressing the cleanup. He also suggested a meeting with all the parties (EPA and NJDEP) onsite to hash out all of our issues.*

*EPA needs to know the State's position regarding this cleanup. Mr. Friedman continues to remind me of the limited funds his client has to clean up the site, and they remain committed to doing no additional sampling, excavation, treatment, etc. at the site - convinced that a TSCA cap should suffice.*

*As you are aware, EPA is interested in performing an evaluation to investigate the possibility of a Superfund cleanup, and as such, we need to know whether the State has similar intentions.*

On 11/10/11, Mel Hauptman forwarded an email from Fred Mumford to me which stated that a letter from NJDEP had been sent to the Unimatic LSRP that day requesting that the State's concerns be addressed.

On 11/29/11 – I spoke with Chris Gellar who identified Ashish Joshi (AJ) as the person reviewing the LSRP submittal. AJ referred to *RTC geologists* (?) and forwarded their comments to the LSRP that “delineation is not complete”. They received Ben Alter's response to comments on 11/29/11. I requested copies of the State letter and Alter's response.

On 12/22/11, I sent a follow up email to Ashish Joshi, as I had not yet received copies of the correspondence.

I have heard nothing from any party since.